

FILED
IN CLERK'S OFFICEUNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

2006 JUN 14 A 11:17

UNITED STATES OF AMERICA,)	CRIM. NO. 04-30046-MAP
)	DISTRICT COURT
V.)	MASSACHUSETTS
JOSEPH SULLIVAN, ET AL.)	
Defendants)	JUNE 12, 2006
)	
)	

**MOTION OF DEFENDANT JOSEPH SULLIVAN
TO MODIFY CONDITIONS OF RELEASE**

Now comes the Defendant, Joseph Sullivan, and moves that the conditions of his pre-sentencing release, restricting his travel to the Commonwealth of Massachusetts and surrounding New England states be modified.

The Defendant seeks permission to travel to Delaware with his fiancée Amanda Hendrix for a vacation from Friday, June 16, 2006 until Saturday evening June 17, 2006. Mr. Sullivan and his fiancée will be staying with Ms. Hendrix's aunt, Donna Rodrigues at 31 White Rabbit Road, Smyrna, Delaware. Mr. Sullivan will have his cell phone, telephone number 413-335-3930, throughout this vacation.

Counsel for the Defendant has conferred with counsel for the government and the government does not oppose the allowance of this motion.

Wherefore the Defendant respectfully requests that the within motion be allowed.

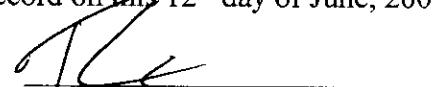
The Defendant
Joseph Sullivan,
By His Attorney,



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CERTIFICATE OF SERVICE

I, Thomas Kokonowski, Esquire, counsel of record, do hereby certify that I have served a copy of the foregoing motion by mail, to all attorneys of record on this 12th day of June, 2006.



Thomas Kokonowski